

CITY & COUNTY OF SAN FRANCISCO

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LINDA RICHARDSON
TIDA BOARD PRESIDENT

March 22, 2012

Re: CDPH Radiological Test Results During the Week of March 18, 2013; Certain Readings Above Background Levels

Dear Residents:

On March 14, 2013, the Treasure Island Development Authority (TIDA) sent a Residential Advisory Notice to all households on Treasure Island. This notice informed residents of TIDA's request that the California Department of Public Health (CDPH) perform radiological surface scans of all publicly accessible areas and residential backyards within the Site 12 housing area that CDPH had not previously scanned. TIDA made this request in order to connect all the areas of Site 12 with one coherent and complete survey so that all residents living on Treasure Island could be assured that radiation levels do not pose a threat to human health or safety.

CDPH began conducting the requested scans on Monday, March 18th. As of Thursday, March 21st, CDPH had completed scans of approximately 80-90% of the Site 12 housing area. TIDA is continuing to work with its housing providers to provide access to the remaining residential backyards so that CDPH can complete the scans. TIDA expects that CDPH will finish their field work by the end of next week.

While CDPH's field work is still on-going, TIDA is sending this letter to all Treasure Island residents now in order to provide up to date information and the preliminary results from the scans that have been completed. On Monday, March 18th and Tuesday, March 19th, CDPH found readings above naturally occurring ("background") radiation levels at five locations within publicly accessible areas of Site 12 (see attached figures for the locations of these readings and see page two of this letter for information on the Navy's removal of the above background soil in these five areas). All other publicly accessible areas of Site 12 returned readings at or below background radiation levels. To date, no readings above background radiation levels have been found in any of the residential backyards that CDPH has scanned.

Even though above background readings were found at these five discrete locations, TIDA does not have any information that would suggest a human health and safety risk exists to residents living on Treasure Island today. In fact, CDPH's Chief of the Division of Food, Drug and Radiation Safety, Steve Woods issued the following official statement from CDPH to TIDA on Friday, March 22nd:

"As of today, our survey and investigation is incomplete. However, based on preliminary results of our survey to date, it doesn't appear that the soil with the elevated readings poses a significant health risk to the public."

CDPH immediately contacted the Navy when they discovered these above background readings and the Navy took swift action by conducting their own confirmation sampling, investigations and soil removal actions at each of the five locations on Wednesday, March 20th and Thursday, March 21st. CDPH staff provided oversight of the Navy's work in the field. Upon completion of their investigations and soil removal actions, the Navy restored the ground surface with new sod and performed surface scans to confirm that radiation levels had been returned to background levels.

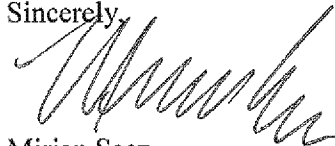
Over the next several months, the Navy will conduct further investigations in these five locations to determine if any residual radiological contamination is present beneath the ground surface even though the surface measurements are now at background levels. If any radiological contamination is found, the Navy is required to clean it up in accordance with all applicable laws. The results of the Navy's investigations will be provided to all Treasure Island residents as soon as they are available.

The City and TIDA will continue to review, examine and question all reports, testing and analysis from the Navy, and the regulatory agencies, including CDPH, to ensure that the Navy fulfills its obligations to clean the island in a manner that is protective of human health, both for today's residents and to ensure that the redevelopment of Treasure Island will be safe. The City's Department of Public Health (SFPDHP) and TIDA will also continue to work diligently with DTSC and CDPH to ensure that the Navy's cleanup program is conducted in accordance with the highest human health and safety standards.

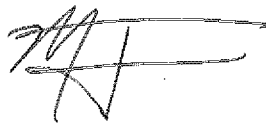
If you have any questions regarding CDPH's scans or the Navy's environmental cleanup program, please call the **Treasure Island Environmental Cleanup Hotline at: (415) 487-4841**. TIDA and the City are committed to providing residents and the general public with up to date information and answering questions and concerns related to the Navy's environmental cleanup program. If you wish to contact CDPH directly about their efforts, you may reach them at TreasureIslandQuestions@cdph.ca.gov.

Thank you for your time and attention to these important issues. We will continue to inform you in a timely manner of any pertinent or new information as we receive it. Please do not hesitate to contact our office with any questions or concerns.

Sincerely,



Mirian Saez
Director of Island Operations



Michael Tymoff
Treasure Island Development Project Director

Cc: Jane Kim, District 6 Supervisor, City and County of San Francisco
Barbara Garcia, Director of Health, San Francisco Department of Public Health
Naomi Kelly, City Administrator, San Francisco General Services Agency
Keith Forman, United States Navy BRAC Environmental Coordinator
Dan Ward, Statewide Department of Defense Cleanup Manager, DTSC
Steve Woods, CDPH Division of Food, Drug and Radiation Safety
Treasure Island Development Authority Board of Directors
Treasure Island/Yerba Buena Island Citizens Advisory Board Members
United States Navy's Restoration Advisory Board Members



FAQs: Radiation at Treasure Island

- *Q: Should I be concerned about radiation at Treasure Island? Is it dangerous to live here?*

A: The two principal regulatory agencies overseeing radiation issues at Treasure Island both have said they are not aware of any human health risks to people living and working on Treasure Island. Those agencies are the California Department of Toxic Substances Control (DTSC) and the California Department of Public Health (CDPH).

- *Q: How do these agencies know that Treasure Island is safe from radiation?*

A: Both agencies have provided years of independent oversight and monitoring of the Navy's clean-up work on Treasure Island to ensure it is conducted in accordance with human health and safety standards. In the Fall of 2012, CDPH conducted its own independent surface scans of areas identified by the Navy as being potentially radiologically impacted. According to CDPH's reports on its surveys, *"There were no locations in the areas surveyed that indicated any radiological concerns or any reading above background."* This means the radiation levels that CDPH measured were at, or below, naturally occurring radiation levels. CDPH also reported that *"no health and safety concerns were identified in our surveys in or around the locations"* that were scanned.

- *Q: Why is CDPH doing more scans now? Does this mean my health is at risk?*

A: The Treasure Island Development Authority (TIDA) recently requested that CDPH perform radiological surface scans of all publicly accessible areas and residential backyards within the Site 12 housing area that had not previously been scanned. Although these surveys are ongoing, CDPH issued the following statement to TIDA on March 22, 2013: *"As of today, our survey and investigation is incomplete, however, based on preliminary results of our survey to date, it doesn't appear that the soil with the elevated readings poses a significant health risk to the public."*

- *Q: If it's not dangerous to live here, why is the Navy cleaning up the island?*

A: Government standards require that known radiation sites be cleaned up to levels known as "background" or "near-background" levels -- regardless of whether the radiological levels pose any undue risk to human health. Background radiation is the radiation that is present in the natural environment. The contamination found to date at Treasure Island are from

items such as luminescent dials, buttons and deck markers (or fragments thereof) that contain Radium 226 (Ra-226). Ra-226 is a naturally occurring radioisotope, found throughout the Earth's crust. The site is being cleaned because Ra-226 has been discovered at Treasure Island at levels that are above what is considered "background;" not because the levels have been determined to pose a present health risk to the public.

- *Q: How long has the Navy known about radiation on Treasure Island?*

A: A previous comprehensive basewide evaluation for radiological issues – the Historical Radiological Assessment (HRA) – was conducted by the Navy in 2006. The 2006 HRA assessed 542 historical and current sites (e.g., buildings, structures, and open areas) at Treasure Island for their potential to have radiological contamination. Under the terminology used by the Navy, sites are categorized either as "impacted" or "non-impacted." If a site is categorized as "impacted," it does not mean that any radiological contamination has been discovered at the site; rather it means that activities were conducted at the site that had the potential to result in radioactive contamination in excess of natural background levels. Only five of the 542 assessed sites were identified as "impacted" in the 2006 HRA. The impacted sites identified at TI in the 2006 HRA included Building 233, the internal sink drain traps and sanitary sewer lines at Building 233, Building 344, Building 343, and solid waste disposal areas (SWDAs) located within IR Site 12.

- *Q: If they've known for years, what's new?*

A: Since 2006, the Navy has completed site-specific investigations of the impacted areas identified in the 2006 HRA. The investigations confirmed that some of the impacted areas did indeed contain contaminated material. Based on these findings, the Navy and regulators determined that additional assessment was warranted to further understand the sources and disposal processes for the radiological material. The Navy's draft *Historical Radiological Assessment – Supplemental Technical Memorandum* (HRASTM) issued in August 2012 provided new information about activities that had the potential for radiological contamination. That resulted in nine additional sites to be characterized as impacted." The draft HRASTM is still undergoing regulatory agency review.

- *Q: Is the radiation everywhere? I read that it's more widespread than previously disclosed – what does that mean?*

A: Radiological contamination above background levels has been found in only certain areas on Treasure Island. As noted above, certain additional areas have been categorized as "impacted" and in need of further assessment. The Navy is currently working on these additional areas to determine if

radiological contamination is present. If discovered, the contamination will be removed.

- *Q: What are the metal disks on Treasure Island that contain radiation?*

A: Of the radiologically contaminated items found at Treasure Island, many have been items such as luminescent dials, buttons and deck markers (or fragments thereof). The metal disks were deck markers -luminescent disks that were fastened to the decks of ships with screws and used to provide low-level light sources at night.

- *Q: What kind of radiation has been found at Treasure Island? Is my water safe to drink and take a shower in?*

A: People are continually exposed to different levels of radiation in the environment (from sources like naturally occurring elements in soil, cosmic radiation, etc.) and from other man-made sources (medical X-rays and consumer products). To date, the type of radiological contamination found at Treasure Island has been Radium-226 (Ra-226), which is naturally occurring. Natural radioelements are always present in soil, air, water and foods, as well as in our bodies. The drinking water on Treasure Island is tested frequently and regularly by the San Francisco Public Utilities Commission and has been found to be safe to drink and free from radionuclides and other contaminants of concern. The water on Treasure Island is safe to drink and bathe in.

- *Q: How much is too much radiation?*

A: The national regulatory goal is for a person to receive less than 100 millirems/year exposure from all additional sources of potential exposure. This is above or in addition to the average dose that the United States public receives of 620 millirem/year from all sources. By comparison - a radiation worker is allowed to receive 5000 millirems/year. There is also great variability in natural background radiation levels by geographic location. For example, the United States national average for background radiation is 300 millirem/year. In other parts of the world, background can be over 1,000 millirem/year (parts of France and India) and up to 17,500 millirem/year in parts of Brazil.

- *Q: Who is responsible for cleaning it up? I read about the Navy, the California Department of Toxic Substances Control and the Department of Public Health. What are their respective roles?*

A: The Navy is responsible for clean-up activities at Treasure Island. The Navy is the current landowner, even though Treasure Island is not an active

military installation. Much of the Island is leased to TIDA, but this does not reduce the Navy's clean-up responsibilities.

In 1997, Treasure Island was officially closed and since that time, Treasure Island has been the subject of extensive investigation and remediation activities under the Navy's Base Realignment and Closure (BRAC) Program. The remedial activities conducted by the Navy BRAC are overseen by the California Department of Toxic Substances Control (DTSC). The California Department of Public Health (CDPH) provides input and advice to the DTSC on radiologically-impacted sites. The DTSC, the CDPH, the U.S. Environmental Protection Agency, and the Regional Water Quality Control Board attend a monthly meeting to provide input to the Navy on the investigations and remediation at Treasure Island for all contaminants including radiation.

- *Q: What is the City's job in all of this? Doesn't the City own Treasure Island?*

A: The City does not own Treasure Island at this time, but TIDA leases most of the Island and maintains and operates it under a cooperative agreement with the Navy. The City has negotiated a development agreement for the development of the Island following the transfer of the Island from the Navy, which will occur in phases after the property is remediated by the Navy. While TIDA operates the Island in anticipation of future ownership, the City and TIDA are not responsible for the cleanup.

Additional Information and Resources

For additional information, please visit CDPH's website where they have their own Frequently Asked Questions and Answers about Radiation, as well as links to additional resources and information on radiation:

www.cdph.ca.gov/pages/radiationfaqs2011.aspx

If you have any questions regarding radiological contamination, human health and safety concerns, or the Navy's environmental cleanup program, please call the **Treasure Island Environmental Cleanup Hotline at: (415) 487-4841**. TIDA and the City are committed to providing residents and the general public with up to date information and answering questions and concerns related to the Navy's environmental cleanup program. Please leave a detailed message regarding any questions, comments or concerns you may have about the Navy's cleanup activities and someone will get back to you within one business day.